

## **REMARKS**

Claims 1-24 are currently pending.

### **Objections**

The Examiner has objected to claims 1-14 on the grounds that there is no proper antecedent basis for the term the "the first form roller." Claim 1, line 8. The claims has been amended to indicate that the press has "at least one ink form roller normally in rotational contact with the plate cylinder . . . which applies ink to the plate cylinder after the plate cylinder contacts a blanket cylinder of the press." The amendment is provided for clarification and not to narrow the scope of claim 1. It is noted that original claim 4 requires that the drive form roller is the first roller to apply ink to the plate cylinder after the plate cylinder contacts a blanket cylinder of the press, i.e., is the first form roller.

### **Art Rejections**

#### **Independent Claim 1**

Independent claim 1 relates to apparatus for removing foreign particles from a rotary press including a variable speed servo motor which is directly coupled to one of the at least one ink applying form rollers in contact with the plate cylinder. The controller for the variable speed servo motor is settable to maintain any one of several different relative surface speeds between the driven form roller and the plate cylinder.

Claim 1 stands rejected under 35 U.S.C. § 103 over the combination of Garner et al. and Eltner et al. The Examiner has admitted that Garner et al. does not

teach a variable speed servo separate from the press drive and coupled to the form roller. Eltner et al. does not provide the missing teaching. In Eltner et al. the drive 43 directly drives ink transfer roller 23. The ink apparently eventually passes to the first ink applicator roller 17. The ink applicator rollers 17-20 apply ink to "printing form cylinder" 8. The form cylinder is driven by "main drive" 12. There is no teaching of a variable speed servo motor separate from the main drive and directly coupled to the first form roller, nor of a controller settable to maintain any one of several different relative surface speeds between a first form roller and a plate cylinder. Nor is there a teaching to do so for removing foreign particles as recited in claim 1.

With regard to dependent claim 5, the cited references do not disclose retrofitting an existing press with the apparatus of claim 1. With regard to dependent claims 9 and 13, since the cited references do not disclose the apparatus of claim 1, they cannot render obvious the range of selectable surface speeds recited in claim 9, nor the operating modes and surface speed differentials recited in claim 14.

**Independent Claim 15**

Independent claim 15 recites a variable speed servo motor for applying a braking action to a roller applying ink to the plate cylinder. A sensor is provided for sensing the speed of either the plate cylinder or the press drive. A controller for the variable speed servo motor is responsive to the sensor and maintains a selected surface speed differential between the plate cylinder and the ink applying roller during printing to improve print quality.

As noted above, Garner does not teach a variable speed drive. Eltner does not teach use of a servo motor for selectively applying braking force to the ink applying roller, and then maintaining a selected surface speed differential. Thus, even were the references properly combinable, they would not teach or suggest the invention as claimed in independent claim 15.

**Independent Claim 19**

Independent Claim 19 is a method for removing foreign particles from the plate cylinder. It includes the step of sensing the speeds of rotation of both the plate cylinder and a form roller inking the plate cylinder. A torque is applied to the form roller based on the sensed speeds to produce a speed differential between the form roller and the plate cylinder to thereby remove foreign particles from the plate cylinder.

As discussed above, Garner does not disclose a variable speed drive. Eltner et al. does not teach the application of torque to the form roller based on the sensed speeds to produce the claimed speed differential to remove foreign particles from the plate cylinder. Thus, Eltner fails to provide the essential content of the claim.

In light of the foregoing, applicants respectfully request reconsideration and allowance of the above-captioned application. Should any residual issues exist, the Examiner is invited to contact the undersigned at the number listed below.

Respectfully submitted,

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